

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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DUSHANNE ASHLEY,

Plaintiff,

-against-

DET. MIKE CIVIL,

Defendant..

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**DEFENDANT'S PROPOSED**  
**VOIR DIRE**<sup>1</sup>

14-CV-5559 (MMH)

1. Do you have any bias against the police?
2. Do you have any bias against the NYPD?
3. Have you or has any member of your family or any close friend ever had any contact or interaction with the NYPD? If yes, please describe.
4. Have you been arrested? [May be discussed in private]
5. Have you or any member of your household or any close friend ever been stopped and/or questioned by a police officer? If so, what were your feelings about that?
6. Have you or a family member or close friend ever made a complaint about a police officer or other law enforcement officer? If so, please describe the complaint outside the presence of the other potential jurors.

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<sup>1</sup> Defendant has only proposed claim specific questions with the understanding that Your Honor, or a designated Magistrate Judge selected to preside over jury selection, will have standard background questions. Should the Court wish that defendant propose those as well we will promptly supplement this filing.

7. Have you or has any member of your family or any close friend ever been the victim of a crime? If so, please describe the circumstances.

8. You may have heard or read about recent incidents involving the police that have been in the news. These situations have absolutely nothing to do with this case or the individuals involved in this case. To the extent you have any feelings about any unrelated incidents involving the police, either positive or negative, will you be able to set those feelings aside and render a verdict in this case based solely on the evidence?

9. Have you or any member of your household attended any protests in the last six months? If so, please explain at sidebar outside the presence of the other prospective jurors.

10. Have you or any members of your family or any of your close friends worked for the NYPD or law enforcement? If so, what positions were held and when?

11. If you are selected as a juror in this case, you will be required to decide the case solely on the evidence introduced and the instructions that the judge will give you concerning the law, whether you agree with the law or not. Is there any reason why you could not do that?

12. Do you have any reason to believe that anything in your life experience would tend to make you partial to one side or the other in this case?

13. Do you believe that the fact that the plaintiff started this lawsuit and is here today for trial means that there must be at least some merit to the plaintiff's allegations?

14. Do you know of any reason why you think that you could not render an impartial verdict in this case?

Dated: New York, New York  
July 28, 2023

HON. SYLVIA O. HINDS-RADIX  
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City of New York  
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By: /s/  
Brian Francolla

cc: all counsel of record (by ECF)